

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF RHODE ISLAND

UNITED STATES OF AMERICA

VS.

1:23-cr-00049-MSM

MI OK SONG BRUINING

MOTION TO CONTINUE SENTENCING

Now comes Mi Ok Song Bruining, the Defendant in the above-captioned matter, and moves this Honorable Court to continue sentencing and extend the time for the filing of sentencing memoranda and reports in this matter, for a period of 30 days. The defendant's sentencing hearing is presently scheduled for January 7, 2025.

Defense counsel is in the process of completing her Sentencing Memorandum and collecting mitigation evidence from Ms. Bruining and her family. Additional time is requested for this purpose. Furthermore, undersigned counsel will be actually engaged in trial in the case of the *United States v. Jennifer Djan* (1:23-cr-00106-JJM) starting on January 12, 2025. That trial is expected to last three weeks.

The undersigned counsel has conferred with Assistant U.S. Attorneys Sara Bloom and Kevin Love Hubbard who have indicated that the Government has no objection to the granting of this motion.

Respectfully submitted
Mi Ok Song Bruining
By her attorney,

/s/ Joanne M. Daley, BBO#653375
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CERTIFICATION

I hereby certify that a copy of this motion was delivered by electronic notification to Sara Bloom and Kevin Love Hubbard, Assistant United States Attorneys, on December 27, 2024.

/s/ Joanne M. Daley